



THE CITY OF NEW YORK
LAW DEPARTMENT
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May 10, 2022

BY ECF

Honorable Paul A. Crotty
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

5/11/2022

The request set forth at page 2 (✓) 4

Granted

No indicated

Paul A. Crotty
USDC

Re: Gary Griffin v. City of New York, et al.,
[REDACTED] PAC) (BCM)

21cv8247

Your Honor:

I am the attorney in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York ("City"). The City writes to respectfully request an enlargement of time until May 26, 2022 to answer or otherwise respond to the Complaint and that Your Honor adjourn the Pre-Motion Conference currently scheduled for May 12, 2022 to a date and time convenient for the Court. This is the second request for an extension on behalf of defendant City and the first request, on behalf of defendant City, for an adjournment of the Pre-Motion Conference. Both plaintiff's counsel, Michael Braverman, Esq., and co-defendants' counsel, Eldar Mayouhas, Esq. consent to this request.

By way of background, plaintiff alleges that on December 15, 2018, he was at the Jacobi Medical Center Emergency Room and was physically restrained by members of hospital staff, including hospital police, as well as unidentified NYPD police officers. Plaintiff further claims that he was forced to undergo unwanted medical treatment including an x-ray examination and injection of medication, and was prevented from leaving the hospital. Plaintiff brings federal claims for excessive force, unreasonable seizure, a Monell claim, and various related state law claims against all defendants.

At the outset, this matter was just assigned the undersigned today as the former ACC on this case is no longer with the Special Federal Litigation division. An extension of time will afford the undersigned an opportunity to review any relevant documents in the case prior to

responding to the Complaint on behalf of the City. In addition, the undersigned must also ensure that this Office is in receipt of all the authorizations necessary for the City to obtain any documents relating to plaintiff's allegations.

Similarly, as to the request to adjourn the Pre-Motion Conference currently scheduled for May 12, 2022, the undersigned seeks this adjournment to ensure a productive Pre-Motion Conference, in which the undersigned may meaningfully participate and advise the Court regarding defendant City's position.

Accordingly, defendant City respectfully requests that Your Honor enlarge its time to respond to the Complaint in the above referenced matter until May 26, 2022 and that Your Honor adjourn the Pre-Motion Conference currently scheduled for May 12, 2022 to a date and time convenient for the Court. Thank you for your consideration of these requests. ✓

Respectfully submitted,

KellyAnne Holohan /s/

KellyAnne Holohan
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY ECF**
All counsel of record